

Vinson&Elkins

Jim McGovern
jmcgovern@velaw.com
Tel +1.212.237.0126

MEMO ENDORSED

October 18, 2024

The Honorable Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Adrian Alexander -- 21-CR-530 (SHS)

Dear Judge Stein:

Defendant Adrian Alexander respectfully submits this letter to request that he be permitted to travel to Italy from October 21 to October 27, 2024, to attend the funeral of his father-in-law, who unfortunately passed away last night in Cortina, Italy.

As we have mentioned in prior correspondence with the Court, Mr. Alexander enjoyed a very close relationship with his father-in-law, and Mr. Alexander, who is now 78 years old, wants to be present with his family to support them during this extremely difficult time. As the Court is aware, Mr. Alexander received a 36-month sentence in this case. He was released from FCI Devins to halfway house placement on October 1, 2024, and he is currently on home detention through Monday, October 28, 2024, in recognition of the Jewish holidays. Mr. Alexander will return to halfway house detention on October 28, but he seeks to fly to Italy to attend the funeral (when he would otherwise be on home detention at his apartment).

As the Court is also aware, Mr. Alexander previously traveled to Italy from August 31 to September 18, 2022, and then again from December 22, 2022, to January 6, 2023. In both instances, Mr. Alexander complied with all pretrial service rules and returned to the United States without incident. We have tried unsuccessfully to obtain the position on this request of Mr. Alexander's case manager at the halfway house but note that his pretrial service officer -- who supervised him before he went to prison -- never raised objections regarding his past requests to travel to Italy for family reasons.

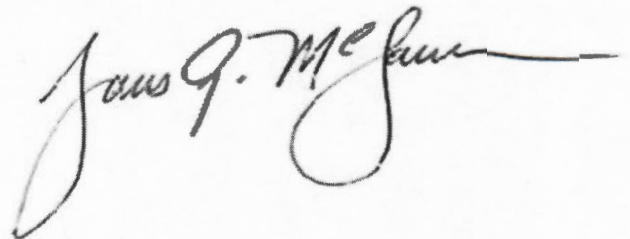
We have contacted the government about this request to travel, and they have consented to the request.

V&E

October 18, 2024 Page 2

Accordingly, we respectfully request that Mr. Alexander be permitted to travel to Italy from October 21 to October 27, 2024. Should the Court desire any additional information, we will provide same as expeditiously as possible.

Sincerely,

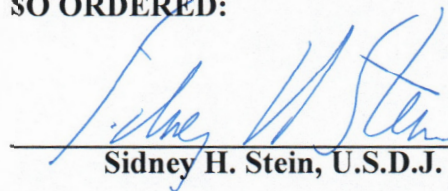
A handwritten signature in black ink, reading "James G. McGovern". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

James McGovern

Defendant's request to travel to Italy from October 21 to October 27 is granted. Defendant shall provide his case manager and probation with all his travel details.

**Dated: New York, New York
October 21, 2024**

SO ORDERED:

A handwritten signature in blue ink, reading "Sidney H. Stein". The signature is cursive and stylized, with a horizontal line drawn underneath it.
Sidney H. Stein, U.S.D.J.